

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEPARTMENT OF THE TREASURY OF)	CASE NO.: 1:14-CV-1031
THE STATE OF NEW JERSEY AND ITS)	
DIVISION OF INVESTMENT, on behalf)	
of itself and all others similarly situated,)	
)	JUDGE DAN AARON POLSTER
Plaintiff,)	
)	
v.)	
)	
CLIFFS NATURAL RESOURCES, INC,)	
<i>et al.</i> ,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTION OF COUNSEL FOR
DEFENDANTS CLIFFS NATURAL RESOURCES INC., JOSEPH CARRABBA,
LAURIE BRLAS, TERRANCE PARADIE, AND DAVID B. BLAKE**

Pursuant to Local Rule 83.9, having provided written notice to defendants Cliffs Natural Resources Inc., Joseph Carrabba, Laurie Brlas, Terrance Paradie, and David B. Blake (collectively, “Defendants”) and providing notice to all other parties with this filing, attorneys Adrienne Ferraro Mueller, Geoffrey J. Ritts, and John M. Newman, Jr. of Jones Day, 901 Lakeside Avenue, Cleveland, Ohio 44114, hereby move the Court for permission to withdraw as counsel for Defendants in the above captioned matter, and substitute Gregory A. Markel, Martin L. Seidel, Ryan J. Andreoli, and Gillian G. Burns of Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, New York 10281, and Christopher S. Williams, Kimberly Moses, and Eric S. Zell of the law firm Calfee, Halter & Griswold LLP, 1405 East Sixth Street, Cleveland, Ohio 44114, in place of Jones Day, as counsel of record for Defendants in this action. The attorneys from the firm of Cadwalader, Wickersham & Taft LLP will move for admission *pro hac vice* contemporaneously with the filing of this Motion. Similar motions for substitution

of counsel are also being filed in *Black v. Carrabba, et al.*, Case No. CV-14-827803, *Williams v. Carrabba, et al.*, Case No. CV-14-829499, and *Asmussen v. Carrabba, et al.*, Case No. CV-14-829259, all of which are pending in the Cuyahoga County, Ohio Court of Common Pleas, and in *Rosenberg v. Cliffs Natural Resources, Inc., et al.*, Case No. 1:14-cv-1531, which is pending in the United States District Court for the Northern District of Ohio.

Respectfully submitted,

Dated: September 10, 2014

/s/ Adrienne Ferraro Mueller (by consent)

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/s/ Gregory A. Markel (by consent)

GREGORY A. MARKEL (*pro hac vice* motion to be filed)
MARTIN L. SEIDEL (*pro hac vice* motion to be filed)
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Counsel for Defendants Cliffs Natural Resources, Inc., Joseph A. Carrabba, Laurie Brlas, Terrance M. Paradie, and David B. Blake

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *Motion for Leave to Withdraw and Substitution of Counsel for Defendants Cliffs Natural Resources, Inc., Joseph A. Carrabba, Laurie Brlas, Terrance M. Paradie, and David B. Blake* was filed electronically on September 10, 2014. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Christopher S. Williams

Counsel for Defendants
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Carrabba, Laurie Brlas, Terrance M.
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